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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Kristin Lawson, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

Full Tilt Poker Ltd., et al.

Defendants.

Case No. 11-CV-6087 (LBS)

**STIPULATION OF ACCEPTANCE OF SERVICE AND DESIGNATING
TIME TO RESPOND TO COMPLAINT**

WHEREAS, the above-captioned action was filed on August 30, 2011;

WHEREAS, Plaintiff filed an Affidavit of Service of Defendant Phillip Ivey, Jr. on
November 23, 2011, describing service made on November 17, 2011;

WHEREAS, the above-captioned action was accepted by this Court as related to an
already-pending action styled *Segal, et al. v. Bitar, et al.*, 11 civ. 4521 (LBS) (the "Segal
Action") and the two cases purportedly arise from the same events and involve many of the same
Defendants; and

WHEREAS Defendant Phillip Ivey, Jr., filed a motion to dismiss the Segal Action on
September 15, 2011, and that motion has been briefed and awaits decision by the Court;

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned parties
that Defendant Phillip Ivey Jr. will waive service of the summons and Complaint with respect to
the above-captioned action;


IT IS FURTHER STIPULATED AND AGREED by and among the undersigned parties that, pursuant to and consistent with Federal Rule of Civil Procedure 4(d)(5), neither this Stipulation nor Defendant's acceptance of service and agreement to refrain from objecting thereto waives or otherwise abrogates any of Defendant's rights to raise any objection or defense based upon personal jurisdictional issues or improper venue, and that Defendant expressly reserves any and all rights to raise objections and defenses based upon jurisdiction or venue;

IT IS FURTHER STIPULATED AND AGREED by and among the undersigned parties that Defendant Phillip Ivey Jr. expressly reserves all rights to file a Rule 12(b) motion on any and all grounds except insufficient service of process and neither this Stipulation nor Defendant's acceptance of service abrogates Defendant's ability to file such motion.

IT IS FURTHER STIPULATED AND AGREED by and among the undersigned parties that the time for Defendant Phillip Ivey Jr. to respond to the Complaint in the above-captioned action is extended to 14 days from the date of the Court's decision on his pending Motion to Dismiss in *Segal, et al. v. Bitar, et al.*


IT IS FURTHER STIPULATED AND AGREED by and among the undersigned parties that this Stipulation may be executed in any number of counterparts, and that executed copies of this stipulation sent by PDF or facsimile shall be deemed as signed originals.

Dated: January 19, 2012

By: 
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Attorney for Defendant Phillip Ivey Jr.

SO ORDERED:


THE HONORABLE LEONARD B. SAND

1/23/12

